

BELDOCK LEVINE & HOFFMAN LLP
99 PARK AVENUE, PH/26TH FLOOR
NEW YORK, N.Y. 10016

JONATHAN MOORE
DAVID B. RANKIN
LUNA DROUBI
MARC A. CANNAN
CYNTHIA ROLLINGS
JONATHAN K. POLLACK
HENRY A. DLUGACZ
STEPHEN J. BLUMERT
MYRON BELDOCK (1929-2016)
LAWRENCE S. LEVINE (1934-2004)
ELLIOT L. HOFFMAN (1929-2016)

TEL: (212) 490-0400
FAX: (212) 277-5890
WEBSITE: blhny.com

COUNSEL
BRUCE E. TRAUNER
PETER S. MATORIN
KAREN L. DIPPOLO
MARJORY D. FIELDS
EMILY JANE GOODMAN
(JUSTICE, NYS SUPREME COURT, RET.)
FRANK HANDELMAN

March 23, 2023

REF:

8390.05
WRITER'S DIRECT DIAL:
212-277-7275
ldroubi@blhny.com

VIA ECF

Honorable Paul A. Engelmayer
United States District Court
Southern District of New York
40 Foley Square, Room 2201
New York, NY 10007

Re: *Ahmad et al. v. NYCHHC et al.*, 20-cv-00675 (PAE)

Dear Judge Engelmayer:

This firm represents the seven Plaintiffs with remaining claims in the above-referenced action. We write, jointly with Defendants, to update the Court on the Parties' settlement discussions and request an adjournment of the pre-motion conference on Defendants' anticipated motion for summary judgment, currently scheduled for April 10, 2023, Dkt. No. 90, until after the Parties' next settlement conference before Magistrate Judge Willis, currently scheduled for April 12, 2023.

On January 24, 2023, counsel for the Parties, the Plaintiffs, and an H+H representative, attended a productive in-person settlement conference with Magistrate Judge Willis. The Parties engaged in good faith discussions and after a full day of settlement discussions, agreed to schedule a subsequent conference focused on four of the seven Plaintiffs. At that subsequent conference on March 6, 2023, the Parties agreed to an agreement in principle regarding Plaintiff Syed Kazmi. The April 12, 2023 conference will focus on the claims of Dr. Saleem Ahmad. The Parties anticipate scheduling at least one additional settlement conference with the remaining Plaintiffs thereafter.

The Parties therefore request that the Court reschedule the pre-motion conference to a date after the April 12, 2023 settlement conference before Magistrate Judge Willis to allow the Parties to focus on settlement and spare the Court from expending resources discussing a motion that may no longer be necessary as to some or all Plaintiffs following the settlement conferences.

We thank the Court for its attention in this matter.

BELDOCK LEVINE & HOFFMAN LLP

Hon. Paul A. Engelmayer

March 23, 2023

Page 2

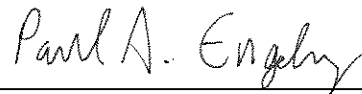
Respectfully submitted,



Luna Droubi

cc: All Parties *via* ECF

The Court adjourns the pre-motion conference to April 18, 2023 at 3 p.m. The parties are directed to file a joint status report by April 14, 2023. SO ORDERED.



PAUL A. ENGELMAYER

United States District Judge

March 24, 2023